UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 29, 1999

Mr. Talley Jenkins
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, ID 83401-1563

Re: Comments on the Draft Scope of Work for Operable Unit 3-14

Dear Talley:

Enclosed are our comments on the Draft Scope of Work for Operable Unit 3-14. After you have reviewed these comments, let's set up a conference call to discuss them and comments submitted by the State.

Sincerely,

Keith A. Rose
INEEL WAG Manager

Enclosure

cc: Scott Reno, IDEQ

EPA COMMENTS ON THE DRAFT SCOPE OF WORK
FOR OPERABLE UNIT 3-14

1. Page 3, paragraph 4. Incomplete sentence "...Snake River Plain Aquifer would decided for two zones".

2. Page 5, 1st and 2nd bullets. The second bullet seems to make the first redundant. Is it necessary to make separate determinations as described?

3. Page 5, 2nd paragraph in Section 2.1.3. The text states "the average concentration will be used in standard EPA exposure scenarios...", but it is not clear if the "average" means the 95% UCL as described in the previous sentence.

4. Page 7, 2nd and 3rd paragraphs. Scenarios for exposure to contaminants in the SRPA must include consumption of groundwater. The appropriate future use scenario which includes groundwater consumption should be residential, not industrial.

5. Page 9, assumption 2. Why is this an assumption? This seems like common practice.

6. Page 9, assumption 5. This item should not be an assumption in this SOW but should be discussed in the RI/FS workplan. Given the uncertainties in computer modeling, and the desire to leave flexibility to exercise risk management decisions incorporating these uncertainties, the method for determining risk-based cleanup goals for those contaminants which peak after 1,000 years should be left to the RI/FS workplan. We do not want to be driven to a remedial action based on a marginal risk exceedance predicted to occur thousands (or even hundreds) of years in the future with very large associated uncertainties. When determining timeframes for peak concentrations, there needs to be some outer limit beyond which the models will not be used. to EPA recommends that this limit be 10,000 years.

7. Page 9, assumption 7. If the point is that the 3-13 RI/BRA results are adequate to cover ecological assessment for 3-14, it should be said more clearly.

8. Page 14, assumption 9. In the last sentence, eliminate the words "without the contingencies being" and replace with "are".

9. Page 14, assumptions 12 and 13. It's not appropriate at this point to limit the future use scenarios for which feasibility study alternatives will be developed. Definition of future use scenarios, on which alternative will be based, should done after RI data is available and the nature and extent of contamination is better understood and the associated costs of cleanup for each scenario can be estimated.

10. Page 14, assumption 14. The FS should not include ARAR waivers as elements of alternatives. ARAR waivers come into play after the FS has shown alternatives to be impractical.

11. Page 15, assumption 18. Eliminate this assumption, since protection of human health and the environment is a requirement of CERCLA, not an assumption.